

From: [Casey, Carolyn](#)
To: [Zucker, Audrey](#)
Cc: [Wainberg, Daniel](#)
Subject: RE: Work Plan comments
Date: Tuesday, February 07, 2017 12:15:00 PM

Good timing. I just heard back from the DEP and are discussing this internally as well.

From: Zucker, Audrey
Sent: Tuesday, February 07, 2017 12:13 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>
Subject: FW: Work Plan comments

From: Craig Ziady [<mailto:craig@cummings.com>]
Sent: Tuesday, February 07, 2017 7:31 AM
To: Zucker, Audrey <Zucker.Audrey@epa.gov>
Cc: Bruce Hoskins <BHoskins@Fslassociates.com>
Subject: FW: Work Plan comments

Hi Audrey – Following up on our supplemental responses to the work plan comments (below). A couple of our responses raised a fundamental issue/question about EPA's perspective on MassDEP's guidance. I have excerpted our supplemental response to comment number 18 below. Could we please have EPA's response to the issues/questions raised in this response?

ADo you have time for a brief conference call relative to same? We would really like to understand EPA's position on this before we embark upon all of the work contained in the Order.

Thank you.

CPL's Supplemental Response [No. 18] – CPL concurs that a comparison to screening standards is not a Method 3 risk assessment, and has not contended that such a comparison was a Method 3 risk assessment. However, as referenced previously, if groundwater samples have no VOC detections above the MCP Method 1 GW-2 standards and all soil gas samples are below the screening levels contained in MassDEP's Final Vapor Intrusion Guidance (Policy WSC 16-435, October 2016), then sufficient lines of evidence will have been established to support the conclusion that no significant vapor intrusion is occurring. This conclusion follows directly from Table 2-2 of the MassDEP guidance policy – see below:

[table omitted]

Does EPA disagree with this analysis? It appears from EPA's comments that it does not agree with DEP's policy, at least as regards risk analysis. DEP set the screening levels at concentrations that are already considered to be a condition of no significant risk based on Method 3 calculations. Does EPA contend that if all groundwater results show VOC concentrations below the MCP Method 1 GW-2 standards and all soil gas results show VOC concentrations below the residential screening standards (from the 2016 MassDEP vapor intrusion guidance policy), then CPL would still need to perform a Method 3 risk assessment -- even though the DEP guidance observes that a risk assessment is not necessary? It would be helpful to understand EPA's position on this, and if necessary to discuss in person, as there appears to be a disconnect in the parties' respective application and interpretation of DEP's Guidance.

*Craig J. Ziady
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From: Craig Ziady
Sent: Friday, January 27, 2017 5:16 PM
To: Zucker, Audrey
Cc: Bruce Hoskins
Subject: RE: Work Plan comments

Hi Audrey – Thank you for your further comments. In the interest of finalizing this element of the Order, our supplemental responses are attached. Please let me know if you believe that an in-person meeting would be of assistance in reaching agreement on the issues raised/responses provided.

With regard to scheduling, the proposed timetable that was included at Section 8.0 of the Revised Sampling and Analysis Plan included the following:

- Soil vapor point and groundwater well installation/well development – January/February 2017
- First round of soil vapor and groundwater sample collection – February/March 2017
- Second round of soil vapor and groundwater sample collection – April/May 2017

The final schedule will depend on the timing of EPA's approval of the SAP, but these estimates were intended to provide you with an idea of what we are thinking at that time. I expect that a revised QAPP would be submitted by the middle of February.

Please let me know your thoughts at your convenience.
Our response on the Order itself is forthcoming.
Thank you.
Craig

From: Zucker, Audrey [<mailto:Zucker.Audrey@epa.gov>]
Sent: Friday, January 20, 2017 1:12 PM
To: Craig Ziady
Cc: Casey, Carolyn; Wainberg, Daniel
Subject: Work Plan comments

Craig:

I am attaching our comments on your latest SAP submission. Please let us know if you have any questions.

Please also let us know when you expect to submit an updated QAPP and schedule for performance of this sampling.

Thank you.

Audrey